

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

BRANDON CALLIER,

Plaintiff,

v.

AMERICAN-AMICABLE LIFE INSURANCE
COMPANY OF TEXAS and SOPHIA
AHMED,

Defendants.

Case No. 3:22-cv-00018-FM

DECLARATION OF A. PAUL HEERINGA

I, A. Paul Heeringa, hereby declare the following to be true pursuant to 28 U.S.C. § 1746, stating as follows:

1. I submit this Declaration in support of American-Amicable's Opposition to Plaintiff's Motion to Amend in the above-captioned matter ("Action"). I am over 18 years old, have personal knowledge of the facts stated herein and below, and could and would competently testify thereto if called upon to do so.

2. I am Counsel at the law firm of Manatt, Phelps & Phillips, LLP. My office is located at 151 N. Franklin Street, Suite 2600, Chicago, Illinois 60606. My email address is pheeringa@manatt.com. I am admitted to practice in the state of Illinois and before various federal courts, and am in good standing in all jurisdictions where I am admitted. I have been assisting counsel of record for American-Amicable in this matter, and will be submitting my application to appear *pro hac vice* on American-Amicable's behalf.

3. Attached hereto as **Exhibit A** is a true and correct copy of a redline comparison between Plaintiff's operative First Amended Complaint (Dkt. 14) and his proposed Second Amended Complaint. This exhibit was prepared at my direction and under my supervision by our

staff using Microsoft Word, who have regularly prepared such documents in the ordinary course of business, and it accurately reflects the edits to Plaintiff's First Amended Complaint and the additional allegations that Plaintiff's seeks to add thereto.

4. Attached hereto as **Exhibit B** is a true and correct copy of email correspondence sent to and received by me by Plaintiff Brandon Callier on May 17, 2022 at 10:15pm Central Time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on May 20, 2022
in La Grange, Illinois

By: _____ /s/ A. Paul Heeringa
A. Paul Heeringa